

TABLE 1

**AVERAGE ANNUAL EPA RESOURCE REQUIREMENT
NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) SUBPART F - VINYL CHLORIDE**

REPORTING/RECORDKEEPING REQUIREMENT	EPA Hours/ Occurrence (A)	Occurrences/ Plant/Year (B)	EPA Hrs/Yr (C) A x B	Plants/Year (D)	EPA Hrs/ Yr (E) C x D
INITIAL PERFORMANCE TESTS					
New or Modified Facility	24	1	24	0	0
REPEAT PERFORMANCE TEST					
New or Modified Facility	24	0.2	4.8	0	0
REPORT REVIEW					
New or Modified Facility					
Notification of Construction/Reconstruction	1	1	1	0	0
Notification of Anticipated Startup	0.5	1	0.5	0	0
Notification of Actual Startup	0.5	1	0.5	0	0
Notification of Emissions Testing	0.5	1	0.5	0	0
Notification of Physical or Operational Change	0.5	1	0.5	0	0
Emissions Test Report	24	1	24	0	0
Application for Waiver of Testing	24	1	24	0	0
Application for Equivalency	24	1	24	0	0
Initial report	24	1	8	0	0
Quarterly report	4	4	16	44	704
MVV/RVD report	24	3	72	44	3168
TOTAL ANNUAL HOURS/DIRECT PERSONNEL COST					3872
SALARY BURDEN (per year)					
1 person x 3872 hrs/yr x \$36.86/h =	\$142,721.92				
TOTAL ANNUAL BURDEN					

<u>Assumptions</u>	
Number of new plants	0
Rate of failed performance tests	20%
Time required to participate with performance test (per plant)	24
Time require to review construction notification (hours)	1
Time required to review startup and initial test notifications (hours)	0.5
Time required to review performance test (emission test) results (hours)	24
Time required to review application for waiver of testing (hours)	24
Time required to review application of equivalency	24
Time required to review initial report	8
Time required to review quarterly report (hours)	4
Time required to review MVV/RVD report (hours)	24
EPA labor rate	\$36.86
Percentage of new plant visits	100%

* Asssume 20% of initial performance test must be repeated due to failure.

* Assume an houly wage of \$17.55 plus 110% overhead costs which equals \$36.86.

